

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Metal Bank of America State Road - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III

Subject: POLREP #4
Progress - completion of lining activity
Metal Bank of America State Road
A3DE
Philadelphia, PA
Latitude: 40.0203300 Longitude: -75.0389500

To: Ragesh Patel, DEP
Gerald Heston, EPA
Response Center RRC, EPA
Response Center RRC, EPA

From: Michael Towle, On-Scene Coordinator

Date: 11/9/2015

Reporting Period: 10/20/2015 through 11/09/2015

1. Introduction

1.1 Background

Site Number:	A3DE	Contract Number:	
D.O. Number:		Action Memo Date:	9/28/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/28/2015	Start Date:	4/20/2015
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

This Site is the location of a release of hazardous substances into soil which has subsequently migrated into a combined sewer system allowing hazardous substances to migrate from the Site and into the nearby Delaware River.

1.1.2 Site Description

The Site includes an area of soil contaminated by polychlorinated biphenyls (PCBs) now covered by asphalt. A combined storm and sanitary sewer system (drainage system) underlies the Site and exists within the area of contaminated soil. PCBs have been detected in the liquids and solids within the drainage system at concentrations which indicate that PCBs are migrating from the soil at the Site and

then into the drainage system.

1.1.2.1 Location

The Site is located along State Road in the City of Philadelphia, Pennsylvania. The Site is located immediately northeast of the intersection of State Road and Knorr Street.

1.1.2.2 Description of Threat

PCBs release from the soil at the Site and into the combined storm and sanitary sewer that courses under the Site. The contaminated drainage either migrates to the POTW or, in high flow periods, to the Delaware River. PCBs are known to bioaccumulate in fatty tissue and pose a threat to those consuming fish removed from the Delaware River. See Action Memo dated September 28, 2011 for a more thorough description of the Site threats.

Based upon the results of a removal site evaluation, the OSC proposed and EPA Region III selected a Removal Action intending to reduce the off-site migration of PCBs from the Site. An Action Memorandum was signed September 28, 2011 selecting the installation of a liner system inside the drainage in order to minimize the migration of PCBs from the soil into the combined sewer and then off-site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See Prior POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The bulk of the scope of the Removal Action will be accomplished by PADOT pursuant to an Administrative Settlement Agreement entered between EPA and PADOT on April 20, 2015. Under the Agreement, PADOT and its contractors will arrange for the cleaning of the drainage system (combined storm water and sanitary water system) underlying and coursing through the Site and the subsequent installation of a liner system within. The liner system will prevent infiltration into the drainage system of potentially contaminated liquids originating from within the PCBs-contaminated soils at the Site.

See prior POLREPs for a summary descriptions of previous actions.

The EPA OSC will conduct oversight of the actions.

There are 4 key manhole locations involved in the discussion:

#1 - Longshore Street (upgradient to Site)

#2 - onsite location in upgradient position

#3 - onsite location in downgradient position

#4 - Knorr Street (downgradient to Site)

The drainage system makes a bend under the Site between the #2 and #3 manhole positions. A large lateral enters the main drainage in the bend.

2.1.2 Response Actions to Date

At the conclusion of the day of 10/17/15, the sewer system coursing through the Metal Bank Site was successfully lined. Remaining work to be conducted by PADOT contractors would relate to installation of liners in the manhole structures on the Site (#2 and #3) and the reconstruction or rehabilitation of manhole structures and covers to assure the integrity of the drainage system (especially the structure in Knorr Street which had to be deconstructed to allow access to the liner. Additionally, PADOT and the Philadelphia Water Department will evaluate the need to abandon the lateral that formerly entered the main drainage between manhole #2 and #3 in the bend.

Beginning 10/22, PADOT contractors initiated construction and lining activity relating specifically to manholes. A new cone needed to be constructed in the Knorr Street location. Liner material was installed within the two manholes on the Site. This work was completed by 10/26/15.

On October 28, 2015 the two lined and covered dumpsters which contained waste materials removed from the drainage system.

The OSC was informed by PADOT on November 2, that abandonment activities were no longer anticipated as necessary in the lateral. As such, onsite work was deemed complete. The only remaining work related to PADOT (other than a report documenting the activities) is replacement of the fence along Disston Ave.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

There are several responsible parties relating to this Site and EPA enforcement personnel have sent notice letters and are keeping these PRPs informed. The PRP Group sent a representative to the Site to observe all initial activities relating to cleaning (activities relating to the liner were not observed). The OSC coordinated with a representative of the Site owner during the activities and controlled gate access. EPA anticipates working with the PRP Group relating to the completion of the removal action which involves improvements to the asphalt cover to minimize infiltration (this work not anticipated until Spring 2016).

EPA and PADOT entered into an Administrative Settlement Agreement on April 20, 2015. Under the Agreement, PADOT installed a liner in the existing combined drainage system. The PADOT work satisfied a large portion of the selected response action. EPA is now contemplating completion of remaining work under a possible enforcement instrument.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

PADOT will replace a section of perimeter fence it removed prior to initiation of the Removal Action activities. No further onsite work by PADOT is expected. PADOT will summarize response actions in a Final Report which is required by the Agreement.

Further response actions to complete the scope of the Removal Action selected in the Action Memorandum include activities to further reduce infiltration through the asphalt cover. EPA will work towards addressing this remaining work with a PRP Group now being identified for the Site. This coordination is expected to take some time and the work activity is likely to be best conducted in warmer weather anticipated next spring (as it will likely involve application of asphalt sealant).

2.2.1.1 Planned Response Activities

None immediately planned.

2.2.1.2 Next Steps

Await Final Report from PADOT.

Work with PRP Group to accomplish completion of Removal Action.

2.2.2 Issues

No field work is expected until next spring. The OSC believes that application of asphalt sealant is the likely next step and this work may be best accomplished next spring with warmer weather.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

A Special Account is set up for this Site with monies derived from potential responsible parties. Entities conducting response work at the Site are eligible for reimbursement from the account. The OSC monitored the work to assure effort to be consistent with the Agreement and the Action Memorandum. As such, the construction activity conducted by PADOT may be reimburseable from the Special Account.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.